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February 21, 2018

BY ECF

The Honorable Ronnie Abrams
United States District Judge
Southern District of New York
40 Foley Square
New York, New York 10007

Re: United States v. Jason Galanis et al
16-cr-0371(RA)

Dear Judge Abrams:

I represent defendant Bevan Cooney in the above-captioned matter. This Court previously endorsed Mr. Cooney's request to appoint Abraham Hassen as my associate in the case pursuant to the provisions of the Criminal Justice Act ("CJA"), 18 U.S.C. § 3006A. In my letter motion requesting Mr. Hassen's appointment, I requested that leave be granted for Mr. Hassen and I to submit vouchers on an interim basis because it was anticipated that this case was likely to go to trial. However, I failed to include this language in the Order which the Court endorsed.

As this case approaches the April 30, 2018 trial date, Mr. Hassen and I will be concentrating substantially all of our efforts on this matter for entire weeks at a time. Given the voluminous discovery in this case and the fact that pre-trial motions have already been filed, significant work has already been performed. Accordingly, I request that leave be granted for Mr. Hassen and I to submit vouchers on an interim basis.

Your Honor's understanding and consideration of this request are, as always, appreciated. Should the Court have any questions in this regard, please contact me directly. We want to thank the Court in advance for its consideration of this request.

Respectfully submitted,

/S/

Paula J. Notari
Attorney for Bevan Cooney